

**IN THE DISTRICT COURT OF THE UNITED STATES
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

John Schrage,

Plaintiff,

vs.

Hristos V Kaltsas,

Defendant.

Case No.: **2:24-CV-4382**

**PLAINTIFF'S RULE 26(A)(2) EXPERT
WITNESS DISCLOSURES**

Plaintiff John Schrage hereby submits his expert disclosure as required by Federal Rule of Civil Procedure 26(a)(2) and the Court's Case Management and Scheduling Order. Plaintiff designates the following retained expert witnesses who are expected to be called to offer opinions and testify at trial:

- 1. Dr. Paul K. White, MD CLCP**
171 Huntington Road, NE
Atlanta, Georgia 30309

Plaintiff has retained Dr. Paul White to prepare a life care plan projecting Plaintiff's future medical needs and medical expenses resulting from the injuries sustained in the subject collision. Dr. White has offered opinions within a reasonable degree of medical probability on the Plaintiff's future medical needs and the reasonable costs of the same as documented in his report. Reports from this expert, as well as the documentation required by Fed. R. Civ. P. 26(a)(2)(B), were provided to Defendant's counsel on April 30, 2025.

Plaintiff may also call his treating physicians as witnesses. Plaintiff anticipates that his treating physicians will qualify as experts by knowledge, skill, experience, training, or education, and Plaintiff reserves the right to elicit testimony regarding each physician's opinions, if any, regarding the cause, diagnosis, treatment, and prognosis of Plaintiff's injuries. Plaintiff's treating physicians known at this time are as follows:

1. Dr. David Owens, MD.

Dr. Owens is the radiologist who read the magnetic resonance imaging of Plaintiff's brain. Dr. Owens is expected to testify regarding his opinions of the imaging consistent with his MRI reports.

2. Dr. Michael Connelly, MD.

Dr. Connelly is the radiologist who read the magnetic resonance imaging of Plaintiff's shoulder and lumbar spine. Dr. Connelly is expected to testify regarding his opinions of the imaging consistent with his MRI reports.

3. Dr. Adam C. Schaaf, MD.

Dr. Schaaf is an orthopedic surgeon who has provided treatment for Plaintiff's shoulder following this crash. Dr. Schaaf is expected to testify regarding the nature and cause of Plaintiff's shoulder injuries, as well as his treatment of Plaintiff's shoulder injuries and his recommendations for future care, consistent with Dr. Schaaf's medical records.

4. Dr. Jason Highsmith, MD.

Dr. Highsmith is a neurosurgeon who has provided treatment for Plaintiff's lumbar spine following this crash. Dr. Highsmith is expected to testify regarding the nature and cause of Plaintiff's lumbar injuries, as well as his treatment of Plaintiff's lumbar injuries and his recommendations for future care, consistent with Dr. Highsmith's medical records.

Because Plaintiff's medical care is ongoing, Plaintiff reserves the right to supplement his list of treating physicians and to call any treating physician as a witness at the trial of this case. Plaintiff also reserves the right to supplement this disclosure later should the case develop in such a way to warrant additional expert testimony on Plaintiff's behalf. Plaintiff further reserves the right to elicit expert testimony from individuals named as experts by other parties, as well as other witnesses later identified who may qualify as experts under the Rules of Evidence.

[Signature Page to Follow]

Charleston, SC

April 30, 2025.

MORGAN & MORGAN, P.A.

By: /s/Jonathan Graham

Jonathan D. Graham

State Bar No. 105763

Federal Bar No. 13969

E-Mail: jgraham@forthepeople.com

4401 Belle Oaks Drive, Suite 300,

North Charleston, SC 29405

(843) 947-6063

Counsel for Plaintiff